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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Estell L. Thomas,

Plaintiff,

v.

Louis Dejoy, Postmaster General, United  
States Postal Service (Western Area)

Defendant.

Case No. 2:23-cv-00397-MMD-EJY

**Stipulation and Order**

**(First Request)**

Plaintiff Estell L. Thomas and Defendant Louis Dejoy (“Federal Defendant”),  
Postmaster General, United States Postal Service, hereby stipulate and agree as follows:

Plaintiff filed her Complaint on March 13, 2023.

Plaintiff served the United States with a copy of the Summons and Complaint on  
March 21, 2023.

The current deadline for the United States to respond to the Plaintiff’s Complaint is  
on May 22, 2023.

Plaintiff and the Federal Defendant, through undersigned counsel, stipulate and  
request that the Court approve a 60-day extension of time, from May 22, 2023, to July 21,  
2023, for Federal Defendant to file a response to the Complaint, ECF No. 1. This is the  
first request for an extension of time.

The undersigned AUSA needs this additional time to evaluate the complaint and to  
gather information from USPS, including all information regarding Plaintiff’s EEO  
proceedings. The undersigned AUSA has been coordinating with agency counsel since late

1 March when the Federal Defendant learned of this case, however USPS requires additional  
2 time to compile information that potentially pertains to this case. Therefore, the parties  
3 request that the Court extend the deadline for the United States to answer or otherwise  
4 respond to **July 21, 2023**.

5 This stipulated request is filed in good faith and not for the purposes of undue delay.

6 Respectfully submitted this 19th day of May 2023.

7 JASON M. FRIERSON  
8 United States Attorney

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13 *Plaintiff Pro Se*

/s/ Virginia T. Tomova  
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19 **IT IS SO ORDERED:**

20   
21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED:** May 19, 2023